



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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**SEP 13 2016**

Ref: 8EPR-N

Scott Fitzwilliams, Forest Supervisor  
White River National Forest  
c/o Matt Ehrman, Project Leader  
900 Grand Avenue  
Glenwood Springs, Colorado 81601

Re: Final Environmental Impact Statement for the Arapahoe Basin Ski Area Projects;  
CEQ # 20160183

Dear Supervisor Fitzwilliams:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service's (USFS's) Final Environmental Impact Statement (EIS) for the Arapahoe Basin (A-Basin) Ski Area Projects. The USFS White River National Forest has prepared the Final EIS in response to A-Basin's request to implement projects from its 2012 Master Development Plan to improve guest experiences and skier safety. Our review was conducted in accordance with the EPA's responsibilities under section 102 of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act (CAA).

**Project Background**

The Selected Alternative, identified in the Draft Record of Decision, would expand A-Basin's operational boundary by approximately 492 acres and would add approximately 338 acres of ski terrain in the Beavers area. The proposal includes the following components: 1) incorporating the Beavers area into A-Basin's operational boundary; 2) development of the Beavers' terrain, including ski trails and a chairlift; 3) replacing the Molly Hogan and Pallavicini chairlifts; 4) grading around the ridge above the top terminal of the Pallavicini chairlift; 5) construction of the Zuma Access surface lift; 6) removal of the Norway chairlift; and 7) the addition of a canopy tour and a challenge course. The Selected Alternative also includes additional requirements to minimize impacts to various resources compared to the Proposed Action included in the Draft EIS.

**Comments and Recommendations**

Subsequent to the scoping process, A-Basin decided to eliminate from this analysis the zip line project element and the proposal to expand the water storage capacity for additional snowmaking water. The EPA had identified concerns in scoping comments regarding the potential for impacts to the North Fork and mainstem of the Snake River, as well as the water supply at Dillon Reservoir, which could have resulted from expanding snowmaking water storage and changing the water withdrawal regime. The Draft and Final EISs state that additional storage capacity for snowmaking water could be considered in the future, separate from this NEPA process (p. 2-21 and p. 2-22 respectively). We had recommended that the Final EIS describe the future circumstances that would trigger A-Basin to move forward with the expansion of water storage and also the level of NEPA analysis that will be needed to support that

action. We also asked for clarification regarding whether there is a need for supplementary snowmaking as a result of expanding A-Basin's operational boundary and including the additional acreage of skiable terrain in the Beavers area. Although the Final EIS did not include any additional information regarding future water storage expansion scenarios or information on the level of NEPA analysis that would be needed, in the Response to Comments section of the Final EIS, it does state that no snowmaking is proposed in the Beavers terrain.

We have some remaining recommendations associated with water resources. The EPA participated in a site visit at A-Basin on July 13, 2016, to walk the flagged alignment of the proposed egress road that is within and proximate to the North Fork Snake River riparian area. The purpose of the site visit was to better understand how the proposed alignment interfaces with wetlands, including fens, to further inform the discussion of how the USFS plans to avoid and/or minimize impacts to these resources. Site visit conditions revealed significant undulating terrain throughout the Beavers emergency egress road. In addition, wetlands complexes within the proposed alignment also had significant topographic variations.

The Final EIS acknowledges secondary wetlands impacts from overstory forest removal, willow trimming and snow compaction (p. 3-118). There are remaining concerns that during low-snow conditions, compaction in these sensitive wetlands ecosystems resulting from snowcat activity in the egress alignment will cause additional indirect impacts to adjacent wetlands by changing the topographic contours and wetland hydrology. In response, the USFS has committed to a project design criteria (PDC) in Table 2-2 that includes pre and post-construction photo points. Because the proposed alignment is a considerable distance in length, we requested that the USFS monitor a minimum of three sections through larger wetland complexes using GPS photo points. After visiting the site, we further request that the monitoring effort include photo points of all wetlands intersected, approximately 8-10 wetland complexes, to monitor potential indirect impacts. We appreciate, as part of the PDCs and Best Management Practices (BMPs), that the USFS has incorporated a reporting step and EPA review of these photos to monitor any construction effects, and will initiate collaborative mitigation efforts with the EPA and A-Basin should effects of the project be beyond those anticipated in the Final EIS.

We also acknowledge that the Final EIS includes a requirement for a water quality monitoring program, including baseline water quality data collection, monitoring of water quality during construction, and long-term water quality monitoring. We support these efforts to identify any potential stream health issues in order for the USFS to incorporate appropriate mitigation and response measures.

## Closing

We value the opportunity to review the Final EIS. The USFS has incorporated various PDCs and BMPs to address concerns outlined in our previous March 2016 letter, and has committed to work collaboratively with the EPA to monitor and mitigate potential impacts. Thank you for considering our input and responding to our comments. If you have any questions during this stage of your planning process, please contact Melanie Wasco of my staff at (303) 312-6540. Alternatively, I can be reached at (303) 312-6704.

Sincerely,



Philip S. Strobel  
Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation